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September 29, 2020

## BY ECF—2 Pages

Hon. Paul E. Davison, Magistrate Judge United States District Court, S.D.N.Y. The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601-4150

Re: Avila v. New Hudson Family Restaurant Inc. and Suzhen Ni

Case Number 7:18-cv-11102-VB

Joint request for a 30-day extension of time to submit settlement

documents

Original deadline: October 3, 2020 Number of previous requests: None No other deadlines will be affected.

Plaintiff's counsel consents.

## Your Honor:

I represent the remaining defendants in this action, New Hudson Family Restaurant Inc. and Suzhen Ni and write with the consent of plaintiff's attorney to jointly request an extension of 30 days from October 3, 2020, to November 2, 2020, to submit signed settlement documents and the *Cheeks* submission.

The settlement agreement has been prepared and circulated and several minor revisions are being made, none of them jeopardizing the settlement. The *Cheeks* submission and a confession of judgment are being prepared and will soon be circulated. Additional time is required for me, with the help of a translator, to explain the new details of the settlement documents to my client.

I am writing in place of plaintiff's attorney, who is participating in multiple mediations this week.

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Thank you.

Respectfully submitted,

s/ Carolyn Shields

Carolyn Shields Attorney for Defendants

cc by ECF to:

Ms. Clela Errington, Attorney at Law Attorney for Plaintiff